

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

LEA CAIN ) Cause No: 3:19-cv-01385-RJD  
Plaintiff, ) JURY TRIAL DEMANDED  
v. )  
HIMANSHU "SAM" PATEL, )  
And ATHENEON, ILLINOIS, INC. )  
d/b/a MOTEL 6, )  
Defendants. )

**PLAINTIFF'S MOTION TO STRIKE**  
**DEFENDANT'S REQUESTS FOR ADMISSIONS**

NOW COMES Plaintiff Lea Cain, by her attorneys, and for her Motion to Strike  
Defendant's Requests for Admissions states as follows:

1. On February 2, 2021, the Court amended the discovery deadline in this case to March 8, 2021.
2. On March 10, 2021, Defendants filed and served Plaintiff with Requests for Admissions.
3. These Requests were made after the discovery deadline passed. Plaintiff now moves to strike Defendants' Requests for Admissions as they are untimely under the discovery deadline ordered by the Court.

## PRAYER FOR RELIEF

WHEREFORE, based on the foregoing, Plaintiff prays this Court strike Defendant's Requests for Admissions in this matter and for such further relief as this Court deems necessary.

**KENNEDY HUNT, P.C.**

/s/ *MaryAnne Quill*

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2021, I filed a copy of the foregoing electronically with the Clerk of Court, with service to the following:

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